

### **REMARKS/ARGUMENTS**

The rejections presented in the Office action dated September 26, 2005 have been considered. Claims 1-19 are pending in the application. Claims 7-8 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. Applicant appreciates the allowance of Claims 9-15 and conditional allowance of Claims 7 and 8. Reconsideration of the pending claims and allowance of the application in view of the present amendment and response is respectfully requested.

Claims 1-2, 4-5 and 16-19 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,292,833 to *Liao et al.* (hereinafter "*Liao*"). Applicants respectfully traverse the rejection. In order to anticipate a claim, the reference must teach every element of the claim, and it is respectfully submitted that *Liao* does not meet this standard.

For example, regarding Claim 1, the Office Action states in paragraph 3 that "Liao et al disclose a method for retrieving content via a first network from a mobile terminal operating as a server within a second networks [sic] (fig. 6, col. 12, line 19 to col. 8), wherein devices operable on the second network are not directly addressable via the first network." First, Applicant cannot determine precisely what portion of *Liao* allegedly discloses aspects of Claim 1, because the citation "col. 12, line 19 to col. 8" is ambiguous. Regardless, Applicant is unable to find anywhere in *Liao* a description of devices operable on a first network that are not directly addressable via a second network. Also, *Liao* fails to disclose providing services from a terminal on the second network in response to requests from a first network by modifying destination paths of requests originating from the first network. *Liao* describes to a network element that can provide protocol conversion (e.g., UDP to HTTP conversion, col. 13 lines 30-55), but protocol conversion is irrelevant in providing services between networks that utilize different addressing schemes. Protocols such as UDP and HTTP can use the same underlying addressing scheme (e.g., IP addressing), thus protocol conversion can be accomplished without modifying the underlying addressing data (e.g., IP headers). Nowhere does *Liao* disclose modifying destination paths of requests of messages directed to a mobile terminal that cannot be

directly accessed from a first network. *Liao* is also deficient in disclosing similar features of independent Claims 16-19. Therefore *Liao* does not anticipate Claims 1 and 16-19.

Applicant submits that *Liao* does not teach or suggest every limitation of Applicant's Claims 1 and 16-19. Nonetheless, in order to facilitate prosecution, Claims 1 and 16-19 have been amended to include, among other things, modifying requests to indicate that the mobile terminal is operating as a mobile server on the second network. These features are analogous to those set forth in allowable Claim 9, therefore Applicant submits that these amendments place Claim 1 and 16-19 in condition for allowance.

If the Examiner continues to maintain a §102 rejection of Claim 1 based on *Liao*, Applicant respectfully requests clarification of which portions of *Liao* are alleged to teach particular aspects of the claim. In addition to the ambiguity noted above, Applicant is also unable to determine exactly which portion of *Liao* is referenced by "col. 12, lines 19 to col. 14, lines 47 to col. 15, lines 37" as set forth in paragraph 3 of the Office Action (fifth and second lines from the bottom of the page).

Dependent Claims 2, 4, and 5 are dependent from independent Claim 1 and also stand rejected under 35 U.S.C. §102 as being unpatentable over *Liao*. While Applicant does not acquiesce with the particular rejections to these dependent claims, including any assertions concerning inherency, it is believed that these rejections are moot in view of the remarks made in connection with independent Claim 1. These dependent claims include all of the limitations of the base claim and any intervening claims, and recite additional features which further distinguish these claims from the cited references. Therefore, dependent Claims 2, 4, and 5 are also in condition for allowance.

Claim 3 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Liao* in view of U.S. Patent Publication No. 2004/0083114 by *Yue* (hereinafter "*Yue*"). Claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Liao* in view of U.S. Patent Publication No. 2002/0123335 by *Luna et al.* (hereinafter "*Luna*").

The Applicants respectfully traverse the rejection. To establish a *prima facie* case of obviousness based on a combination of references, three basic criteria must be met, as is set forth in M.P.E.P., §2143:

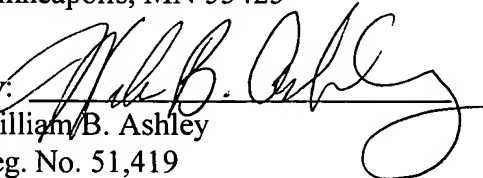
- 1) There must be some suggestion or motivation, either in the reference itself or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings;
- 2) There must be a reasonable expectation of success; and
- 3) The prior art references must teach or suggest all of the claim limitations.

All three criteria must be met to establish *prima facie* obviousness of a claim. For the rejections of Claims 3 and 6, the Examiner relies on *Liao* as teaching the substance of the claims from which Claims 3 and 6 ultimately depend, namely, Claim 1. The Examiner does not rely on *Yue* or *Luna* as providing a remedy to the deficiencies of *Liao* as it pertains to independent Claim 1, nor do *Yue* or *Luna* provide such a remedy. Thus, because neither *Liao*, *Yue*, nor *Luna* teach at least the recitations of Claim 1, the respective combinations of *Liao/Yue* and *Liao/Luna* fail to teach these recitations. Further, combinations of *Liao/Yue* and *Liao/Luna* fail to suggest the invention set forth in Claim 1, as there is no reference to at least providing services from a mobile terminal that is not addressable via a first network. Nor does such a combination teach or suggest providing modifying a request to indicate that a destination path of the terminal is a source of the content. While other requisites of establishing *prima facie* obviousness may also be absent, the Applicants respectfully submit that the cited combination of references at least fails to teach or suggest all of the claim limitations. For at least this reason, Claims 3 and 6 are not rendered obvious by the respective combinations of *Liao/Yue* and *Liao /Luna*, and withdrawal of the rejection is respectfully solicited.

If the Examiner believes it necessary or helpful, the undersigned attorney of record invites the Examiner to contact him at 952.854.2700 to discuss any issues related to this case.

Respectfully submitted,  
HOLLINGSWORTH & FUNK, LLC  
8009 34<sup>th</sup> Avenue South, Suite 125  
Minneapolis, MN 55425

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By:   
William B. Ashley  
Reg. No. 51,419